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January 23, 2026

Attorney Melanie Bachman, Executive Director
Connecticut Siting Council
10 Franklin Square
New Britain, CT 06051

Reference: Connecticut Siting Council Docket No. 543 - The Towers, LLC application for a Certificate of Environmental Compatibility and Public Need for the construction, maintenance, and operation of a telecommunications facility and associated equipment located at 17 Warren Road, Washington (New Preston), Connecticut

Dear Attorney Bachman:

Please find enclosed an original and fifteen copies of a Joint Motion for Balloon Float.

Thank you for your attention to this matter.

Very truly yours,

MORIARTY, PAETZOLD & SHERWOOD



David F. Sherwood

/mds
cc: Service List
Brian E. Hagenbuch, Executive Director

STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

IN RE:

THE TOWERS, LLC APPLICATION FOR A : DOCKET NO. 543
CERTIFICATE OF ENVIRONMENTAL :
COMPATIBILITY AND PUBLIC NEED FOR :
THE CONSTRUCTION, MAINTENANCE, :
AND OPERATION OF A :
TELECOMMUNICATIONS FACILITY AND :
ASSOCIATED EQUIPMENT LOCATED AT :
17 WARREN ROAD, WASHINGTON (NEW :
PRESTON), CONNECTICUT : JANUARY 23, 2026

JOINT MOTION FOR BALLOON FLOAT

Steep Rock Association, Inc., intervenor under C.G.S. § 22a-19, Washington Montessori Association, Inc., intervenor and intervenor under C.G.S. § 22a-19, and Joslyn Pollock, Patricia Werner, Imad Afiouni, Robert Odom, Russell James Mackie, Jr. and Kristy Faulhaber, intervenors and intervenors under C.G.S. § 22a-19 (collectively, “movants”), hereby move that the Connecticut Siting Council require the applicant, The Towers, LLC, to conduct a second balloon float on or before February 24, 2026, so that the movants may make a determination as to whether the proposed cell tower which is the subject of this application will be visible from their respective properties and so inform the Siting Council.

Movants were unaware of the prior balloon float, which was conducted by the applicant on April 25, 2025. The data collected in connection with the prior balloon float comprise an integral part of its “Visual Assessment.”¹ The prior balloon float was not noticed to the public and occurred several months prior to the publication of legal notice of the above-referenced application. Further, the applicant has

¹ Application, Attachment 9.

stated that it will not enter private property to collect data for its visual assessment, so the applicant provides no information on the visibility from hundreds of acres of private property in the immediate vicinity of the proposed tower. The applicant should be required to conduct a second balloon float using the same parameters as the prior balloon float to allow the movants to determine whether the proposed tower will be visible from their properties and to obtain photographic documentation for submission to the Siting Council in Docket No. 543.

According to the applicant, “the primary impact of facilities such as [the proposed cell tower] is visual.”² This motion should be granted so that the Siting Council may fulfill its statutory duty to evaluate “the probable environmental impact of the facility … including a specification of every significant adverse effect, including, scenic, historic and recreational values....” General Statutes § 16-50p (A) (3) (B).

STEEP ROCK ASSOCIATION, INC., INTERVENOR

s/ David F. Sherwood
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WASHINGTON MONTESSORI
ASSOCIATION INC., INTERVENOR

Joseph P. Mortellitti
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² Application, Narrative, p. 16.

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Their Attorneys

CERTIFICATE OF SERVICE

I hereby certify that a copy of this motion was electronically mailed to the following service list on January 23, 2026.

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s/ David F. Sherwood
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Commissioner of the Superior Cour